

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Kartale Richardson

Case: 4:19-mj-30401**Judge: Davis, Stephanie Dawkins****Filed: 07-29-2019****CMP USA v KARTALE RICHARDSON (TH)****CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 12, 2019 in the county of Genesee in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. § 922 (g)(1)

Offense Description

Felon in Possession of a Firearm

This criminal complaint is based on these facts:

That on July 12, 2019, in the Eastern District of Michigan, Kartale RICHARDSON, knowing that he had been convicted of a felony punishable by a term of imprisonment of one year, knowingly possessed, in and affecting interstate commerce, a firearm, in violation of 18 U.S.C. § 922(g)(1).

☒ Continued on the attached sheet.

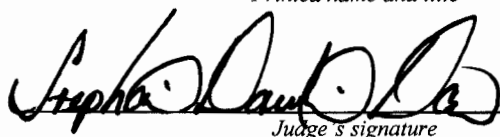

Complainant's signature

James Swain, Task Force Officer, ATF
Printed name and title

Sworn to before me and signed in my presence.

Date: July 29, 2019

City and state: Flint, MI


Judge's signature

Hon. Stephnaie Dawkins Davis, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

James Swain, being first duly sworn on oath, states that:

1. I have been employed as a Michigan State Trooper since August 1989, and assigned to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) since October 2013. I have been involved in numerous investigations of firearms, firearms licensing and narcotic laws resulting in successful federal prosecutions. I have a Bachelor of Science degree in Criminal Justice from Michigan State University.
2. I make this affidavit from personal knowledge based on my participation in this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.
3. I am currently investigating Kartale RICHARDSON, date of birth **/**/1992, for a violation of 18 U.S.C. § 922(g)(1), possession of a firearm by a person who has been convicted in any court of a crime punishable by imprisonment for a term exceeding one year.
4. On July 12, 2019, Michigan State Police Trooper Michael Lopez, was working directed patrol inside the city of Flint and heard a vehicle with an extremely loud exhaust coming from a vehicle traveling east-bound on Pierson Road. Trooper Lopez

was traveling west-bound on Pierson Road and turned his patrol vehicle around to conduct a traffic stop on the vehicle. As Trooper Lopez was catching up to the vehicle, he observed the driver's hand come out of the driver's side window and he heard the sound of metal hitting the pavement and observed sparks flying in the air. Trooper Lopez conducted a traffic stop on the vehicle as it pulled into a liquor store parking lot at the corner of Pierson Road and Fleming Road.

5. Trooper Lopez made contact with the driver, Kartale RICHARDSON. RICHARDSON advised that he did not have a valid driver's license and was asked from the vehicle and handcuffed pending further investigation. There was also a passenger in the car. Other MSP troopers responded to assist Trooper Lopez. One trooper remained with RICHARDSON and his vehicle. Trooper Lopez looked along the roadway where he had observed the driver's hand outside the window and found a Glock, .40 caliber semi-automatic handgun, model 23, in the roadway on Pierson road near Sussex Street, in the far-right east-bound lane. There was an extended magazine that was still inserted into the firearm. The bottom of the magazine was broken and there was .40 caliber ammunition spread all over the roadway.

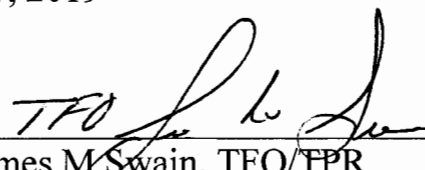
6. On September 21, 2016, Kartale RICHARDSON was convicted in U.S. District Court for the Eastern District of Michigan of being a felon in possession of a firearm, which is an offense punishable by a term of imprisonment which exceeds

one year. His criminal history report also shows other convictions for offenses punishable by more than a year imprisonment.

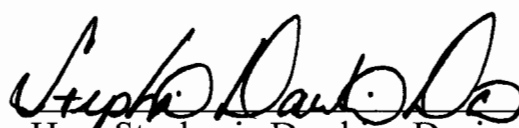
7. On July 29, 2019, ATF Special Agent Jonathan Wickwire, who is recognized by ATF as an expert in the interstate nexus of firearms, told me that the Glock, .40 caliber semi-automatic handgun, model 23, Serial Number #SBK597, was manufactured outside the state of Michigan and the above-described firearm is a firearm as defined in Chapter 44, Title 18, United States Code, and, as such, was manufactured after 1898.

8. Based on the foregoing, I have probable cause to believe that on July 12, 2019, in the Eastern District of Michigan, Kartale RICHARDSON, knowing that he had been convicted of a felony punishable by a term of imprisonment of one year, knowing possessed, in and affecting interstate commerce, a firearm, in violation of 18 U.S.C. § 922(g)(1).

Dated this 29th day of July, 2019


James M. Swain, TFO/TPR
Bureau of Alcohol, Tobacco, Firearms, and Explosives

Sworn to before me this 29th day of July, 2019


Hon. Stephanie Dawkins Davis
United States Magistrate Judge